

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK**

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**DEBRA SPERO**, as Natural Mother of  
V.S., an infant,  
Plaintiffs,

v.

**VESTAL CENTRAL SCHOOL DISTRICT  
BOARD OF EDUCATION, VESTAL CENTRAL  
SCHOOL DISTRICT, JEFFREY AHEARN,  
Superintendent of Schools, ALBERT A. PENNA,  
Interim Principal of Vestal High School,  
DEBORAH CADDICK and CLIFFORD KASSON,  
in their Individual and Official Capacities,**

Defendants,

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**AFFIDAVIT OF CONOR  
TALBUT**

Civil Action No. 3:17-cv-00007  
(GTS/DEP)

STATE OF NEW YORK     )  
                                      ) ss.:  
COUNTY OF BROOME     )

CONOR TALBUT, being duly sworn, deposes and says:

1. I am a Town of Vestal Police Officer and a School Resource Officer ("SRO") posted at the Vestal Central School District ("District"). I make this affidavit of my own personal knowledge and am fully competent to testify as to all matters herein.
2. On December 8, 2016, I was serving as SRO at the District.
3. On that date four female high school students notified me that another student, V.S., had posted a video of a person with a handgun on "Snapchat." The students each expressed fear that V.S. might be planning to engage in a violent act, and in particular that he might do so at the District. They also said other students in the school's "commons" area were similarly discussing the videos and "tweets" and expressing similar concerns.

4. One of the female students showed me on her cell phone various “tweets” V.S. had posted on Twitter regarding allegations of racism at the District, the video of an unidentified female with a handgun, and a video of a female in the hospital. I recorded all of this using the camera on my own cell phone.

5. I immediately notified Assistant High School Principal Deborah Caddick by telephone of the report.

6. Ms. Caddick, Assistant High School Principal Clifford Kasson, and Interim High School Principal Albert Penna immediately left the meeting they were attending and met with me, at which point I showed them the videos and tweets on my cell phone.

7. After some discussion, I left the meeting. I subsequently e-mailed the pertinent footage from my phone to Ms. Caddick, Mr. Kasson, and Mr. Penna, per their request.

8. I received calls from the parents of two of the female students who had reported the matter to me. They expressed the same concern as their daughters – that V.S. might be planning a violent act, possibly at the District.

9. Upon information and belief, V.S.’s father also contacted personnel at the District that day.

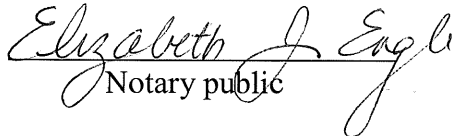
10. Following my meeting with Ms. Caddick, Mr. Kasson, and Mr. Penna, I planned to go to V.S.’s home to investigate, but had to delay because, upon information and belief, V.S. was not home yet. While I waited, several more students either visited my office or talked to me in the hall regarding their concerns from V.S.’s posting the handgun video.

11. The investigation at V.S.’s house began well before 4 p.m., and in fact it was completed and I was back to the District at approximately 2:40 p.m., dismissal time. Upon my

return to the District, students were still present and several more approached me to express concerns regarding V.S.'s posting of the handgun video.

  
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CONOR TALBUT

Sworn to before me this the 15th  
day of December, 2017.

  
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Notary public

